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LOCAL COUNSEL FOR NOBUAKI KOBAYASHI, IN HIS CAPACITY AS THE TRUSTEE AND FOREIGN REPRESENTATIVE OF MTGOX CO., LTD.

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

IN RE:

\$ Case No. 14-31229-sgj-15

MTGOX CO., LTD. (a/k/a MtGox KK),

Bebtor in a Foreign Proceeding.

## **NOTICE OF APPEARANCE AND REQUEST FOR NOTICES**

PLEASE TAKE NOTICE that Marcus A. Helt and the law firm of Gardere Wynne Sewell LLP represent Nobuaki Kobayashi, in his capacity as the trustee and foreign representative of MtGox Co., Ltd. (the "Foreign Representative"), as local counsel and request, pursuant to Rules 2002 and 9010 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), that all notices given or required to be given in this case and all papers served or required to be served in this case be given to and served on them at the following address:

Marcus A. Helt
Thomas Scannell
Gardere Wynne Sewell LLP
1601 Elm Street, Suite 3000
Dallas, Texas 75201
Telephone: 214-999-3000
Facsimile: 214-999-3526
mhelt@gardere.com
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PLEASE TAKE FURTHER NOTICE that the foregoing request includes notices and papers referred to in the Bankruptcy Rules and includes, without limitation, any plans of reorganization, objections, notices of hearings, orders, pleadings, motions, applications, complaints, demands, requests, petitions, disclosure statements, memoranda, briefs and any other documents brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, whether transmitted or conveyed by mail, hand delivery, telephone, telecopier, telegraph, or telefax.

This Notice of Appearance and Request for Notices shall not be deemed or construed to be a waiver of the rights of the Foreign Representative (i) to have final orders in non-core matters entered only after de novo review by a District Judge, (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (iii) to have a District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) regarding any other rights, claims, actions, setoffs, or recoupments to which it may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: April 24, 2014 Respectfully submitted,

GARDERE WYNNE SEWELL LLP

/s/ Marcus A. Helt

Marcus A. Helt (TX 24052187) Thomas Scannell (TX 24070559) Gardere Wynne Sewell LLP 1601 Elm Street, Suite 3000 Dallas, Texas 75201-4761 Telephone: 214.999.3000

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## **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 24<sup>th</sup> day of April 2014, a true and correct copy of the foregoing document was served by electronic means via the Court's CM/ECF system.

/s/ Marcus A. Helt	
Marcus A. Helt	